

**BEFORE THE
PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA**

DOCKET NO. 2019-225-E

IN THE MATTER OF:

South Carolina Energy Freedom Act (H.3659)
Proceeding Initiated Pursuant to S.C. Code
Ann. Section 58-37-40 and Integrated Resource
Plans for Duke Energy Progress, LLC

**PETITION TO INTERVENE
OF VOTE SOLAR**

Pursuant to Rule 103-825 of the rules and regulations of the South Carolina Public Service Commission (“Commission”), Vote Solar hereby respectfully petitions to intervene in the above-captioned docket. Vote Solar states the following grounds in support of this petition:

1. Vote Solar is a non-profit, grassroots organization that works to foster economic opportunity, promote energy independence for consumers, and address environmental concerns by making solar generation accessible and cost-effective for all Americans. Vote Solar works to bring solar into the mainstream by engaging at the local, state, and federal levels to help remove regulatory barriers and implement policies and programs to bring solar to scale. Established in 2002, Vote Solar has over 80,000 members nationally and more than 2,300 in South Carolina.

2. The name and principal business address of Petitioner:

Vote Solar
360 22nd St., #730
Oakland, CA 94612

3. Pursuant to Rule R.103-804(5) of the Commission’s Rules of Practice and Procedure, Vote Solar is represented in this proceeding by counsel who is duly licensed

to practice law in the State of South Carolina and requests that undersigned counsel be added to the official service list:

Thadeus B. Culley
SC Bar # 104428
Vote Solar, Sr. Regional Director and Regulatory Counsel
1911 Ephesus Church Road
Chapel Hill, NC 27517
thad@votesolar.org

4. Vote Solar consents to service via electronic mail and requests that all communications regarding this docket should be directed to Vote Solar's counsel of record.

5. Vote Solar has an interest in the subject matter of this proceeding. The 2020 Integrated Resource Plan (IRP) for Duke Energy Progress, LLC ("DEP") will have profound implications for the energy policy landscape in North Carolina and South Carolina as state and national leaders pivot to address the climate crisis. Moreover, Vote Solar has an interest exploring and emphasizing the opportunities for distributed energy resources to play a greater part in satisfying Duke Energy Corporation's stated corporate carbon emission reduction and climate goals.

6. Vote Solar will contribute to the record of this docket by, among other things, providing insight and experience on how DEP's IRP compare to national trends and how over-reliance on fossil-fired generation exposes current and future ratepayers to material economic and regulatory climate-related risks.

7. No other party will adequately represent Vote Solar's unique interest in this case.

WHEREFORE, Vote Solar respectfully requests that the Commission allow it to intervene in this proceeding and to participate fully as a party in order to protect its unique and substantial interest in this case.

Respectfully submitted this 14th day of September, 2020.

/s/ Thadeus B. Culley
Thadeus B. Culley
SC Bar # 104428
Vote Solar, Regional Director
1911 Ephesus Church Road
Chapel Hill, NC 27517
thad@votesolar.org

CERTIFICATE OF SERVICE

I hereby certify that I have served the persons listed on the official service list for Docket No. 2019-225-E, listed below, a copy of the Petition to Intervene of Vote Solar via U.S. Mail or electronic mail on this day, September 14, 2020.

/s/ Thadeus B. Culley
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PARTIES SERVED

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